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10
11 **UNITED STATES DISTRICT COURT**
12 **CENTRAL DISTRICT OF CALIFORNIA**
13

14 UNITED STATES OF AMERICA,
15
16 Plaintiff,
17
18 v.
19 JUAN CARLOS SERESI,
20
21 Defendant.

Case No. CR-89-190-SVW

**REPLY IN SUPPORT OF MOTION
FOR COMPASSIONATE RELEASE
UNDER 18 U.S.C § 3582(c)(1)(A)**

22 Defendant Juan Carlos Seresi, by and through his counsel of record, Reuven L.
23 Cohen, hereby submits this reply in support of his Motion for Compassionate Release
24 Under 18 U.S.C. § 3582(c)(1)(A).
25

26 Respectfully Submitted,
27 COHEN WILLIAMS LLP
28

Dated: October 20, 2020

By: /s/ Reuven L. Cohen
Reuven L. Cohen, Esq.
Attorneys for Defendant
JUAN CARLOS SERESI

1 On September 14, 2020, Juan Carlos Seresi filed a motion before this Court seeking
2 compassionate release. Dkt. 1407. Therein, Mr. Seresi averred that he met the legal
3 requirements for release – due to his age, health, and the length of time he has spent in
4 custody – that he poses no danger to anyone, and that the balance of the § 3553(a) factors
5 weighed in his favor. On October 15, 2020, the government agreed. Dkt. 1410. This
6 Court should do the same.

7 The government's non-opposition is a powerful indicator that relief is amply justified
8 here. Mr. Seresi has worked tirelessly throughout the past 30 years to better himself. *See*
9 Dkt. 1407 at 1, 10-11. His first-time, non-violent offense need not, and *should* not, result
10 in a death sentence.

11 Mr. Seresi concurs with the government's position that he meets the criteria of the
12 Policy Statement set forth at USSG § 1B1.13 and Application Note 1(B) because he suffers
13 from multiple degenerative medical conditions that make him particularly vulnerable to
14 COVID-19. *See* Dkt. 1410 at 1. Mr. Seresi likewise concurs that his impending
15 deportation obviates any possibility that he will pose a danger to his community upon
16 release, *see* Dkt. 1410 at 2, though his utterly non-violent record amply demonstrates that
17 he posed no such danger in any event. Accordingly, there is no dispute that Mr. Seresi
18 qualifies under the statutory scheme.

19 Mr. Seresi therefore respectfully prays that the Court grant his motion forthwith.
20

21 Respectfully Submitted,

22 COHEN WILLIAMS LLP

23 Dated: October 20, 2020

By: /s/ Reuven L. Cohen

Reuven L. Cohen, Esq.

Attorneys for Defendant

JUAN CARLOS SERESI